

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION NO.
v.	:	
	:	1:13-CV-3168-CC
\$425,055.42 IN FUNDS SEIZED FROM :	:	
UNITED CENTRAL BANK ACCOUNT :	:	
XXXX4605, et al.	:	
	:	
Defendants.	:	

NOTICE OF FILING COMPLAINT FOR FORFEITURE

TO: Daniel F. Farnsworth, Esq.
Attorney for Nisar A. Piracha
100 Peachtree Street, Suite 2060
Atlanta, GA 30303

A civil complaint seeking forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) 21 U.S.C. § 881(a)(6) was filed on September 24, 2013, in the United States District Court for the Northern District of Georgia by Michael J. Brown, Assistant United States Attorney, on behalf of the United States of America, Plaintiff, against \$425,055.42 in Funds seized from United Central Bank Account XXXX4605; \$13,482.41 in Funds seized from Bank of America Account XXXXXXXXX4994; \$41,465.00 in United States Currency; and \$3,047.00 in United States Currency (collectively, the "Defendant Property"). The Complaint alleges that the Defendant Property may, for the causes stated in the Complaint, be forfeited to the United States.

To contest forfeiture of the Defendant Property, any person claiming an interest in the Defendant Property, who received direct notice of the forfeiture action must file a verified claim with the Clerk of this Court pursuant to Rule G(5) of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims, 35 days after the notice is sent. See Rule G(5). In addition, any person who files such a Claim shall file an Answer to the Complaint, or a motion under Rule 12 of the Federal Rules of Civil Procedure, not later than 21 days after the filing of the Claim. See Rule G(5)(b).

Supplemental Rule G(5)(a) provides in pertinent part: "(i) a person who asserts an interest in the defendant property may contest the forfeiture by filing a claim in the court where the action is pending . . ." and "must (A) identify the specific property claimed; (B) identify the claimant and state the claimant's interest in the property; (C) be signed by the claimant under penalty of perjury; and (D) be served on the government attorney designated under Rule G(4)(a)(ii)(C) or (b)(ii)(D)." See Rule G(5)(a). Supplemental Rule G(5)(b) provides in pertinent part: "[a] claimant must serve and file an answer to the complaint or a motion under Rule 12 within 21 days after filing the claim."

The Claim and Answer shall be filed with the Office of the Clerk of Court, United States District Court for the Northern

District of Georgia, 75 Spring Street, SW, Suite 2201, Atlanta, Georgia, with copies of each served upon Assistant U.S. Attorney Michael J. Brown, 75 Spring Street, S.W., Suite 600, Atlanta, GA 30303.

In accordance with Rule G(4)(b) of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims¹, on October 24, 2013, Plaintiff sent this Notice by certified mail, return receipt requested, and via regular U.S. Mail, to every person or entity who reasonably appeared to be a potential claimant to the Defendant Property on the facts known to Plaintiff. **Therefore, a verified Claim must be filed on or before November 29, 2013, and an answer to the complaint or a motion under Rule 12 within 21 days thereafter.**

Respectfully submitted,

SALLY QUILLIAN YATES
UNITED STATES ATTORNEY

/s/ Michael J. Brown
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¹ Rule G(4)(b) provides that "[t]he notice must be sent by means reasonably calculated to reach the potential claimant," and that the "[n]otice may be sent to the potential claimant or to the attorney representing the potential claimant with respect to the seizure of the property or in a related investigation, administrative forfeiture proceeding, or criminal case." Rule G(4)(b)(iii)(A) and (B).